

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

First-Class Package Services (FCPS)  
Service Standards Changes, 2021

Docket No. N2021-2

STEVE HUTKINS

INTERROGATORIES TO UNITED STATES POSTAL SERVICE WITNESS FOTI

(July 21, 2021)

Pursuant to 39 C.F.R. § 3010.311, I hereby submit these interrogatories to  
United States Postal Service witness Foti.

If the witness is unable to provide a complete, responsive answer to a question, I  
request that the witness redirect the question to a witness who can provide a complete,  
responsive answer. In the alternative, I request that the question be redirected to the  
Postal Service for an institutional response.

The instructions contained in my interrogatories to witness Foti, SH/USPS-T-3-1-  
5, are incorporated herein by reference.

Respectfully submitted,

Dated: July 21, 2021

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SH/USPS-T-3-1. Please refer to witness Foti's testimony at 5, lines 1-6: "Across shipping products, the top driver of shipping satisfaction for commercial shippers in FY 2020 is high reliability. According to external market research, the drivers of satisfaction with greatest importance for shippers are: 1) reliability, 2) offering the best end-to-end service; 3) delivering items to destination as fast as possible; 4) delivering packages on the exact day that I expect it; and 5) offering my business the tracking information we need to assist customers." Please confirm that this is the exact wording of the USPS Market Research & Insights, Q1 FY21, Brand Health Tracker — Shipping Services, which is cited in the footnotes. If not confirmed, please provide the exact wording.

SH/USPS-T-3-2. Please refer to witness Foti's testimony at 6, line 13: "We aim to achieve 95 percent on-time reliability." Given that the Postal Service is not required to report service performance for First-Class Package Service to the public or to the Commission, please explain how the Commission, mailers and the public will know if the Postal Service is achieving 95 percent on-time reliability.<sup>1</sup>

SH/USPS-T-3-3. Please explain how non-public service performance scores can have any impact on (a) customer satisfaction, (b) a customer's sense of the "reliability" of First Class Package Services, and (c) a customer's decision-making process about whether or not to use First Class Package Services for a given mailing.

SH/USPS-T-3-4. If the Postal Service implements its plan to change service standards on First Class Package Services, mailers will know for certain that a significant portion of FCPS volume will be subject to slower delivery times. At the same time, they will be unable to know with any certainty just how "reliable" delivery will be in terms of performance scores. Isn't it therefore likely that at least some mailers will choose to send their packages using another delivery service? If answered in the negative, please explain why such a scenario is not likely.

SH/USPS-T-3-5. Please refer to witness Foti's testimony at 8, lines 6-12: "FTC Survey results show that the majority of sampled FCPS-Commercial shippers stated that they would maintain or, in some cases, increase FCPS volumes with these proposed changes.... Therefore, we expect that FCPS volumes will not be materially affected after the proposed changes to FCPS service standards are implemented." Did the Postal Service perform an analysis of the actual volumes that these Commercial shippers typically send in order to determine how much more volume the majority would send and how much less volume the minority might send? If so, please share the results of this analysis.

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<sup>1</sup> See Responses of the United States Postal Service to Chairman's Information Request No. 1 (December 15, 2014), Docket No. MC2015-7, Transferring First Class Parcels to the Competitive List, Question No. 2 (b), in which the Postal Service confirms that "the Postal Service is not required to measure or report service performance for First-Class Package Service to the public, or to the Commission."